REMARKS

I.   Status of the claims

By this Amendment, Applicants propose to amend claims 1, 5, 9, 18, and 22. Claims 1-25 remain pending and under current examination.

In the Office Action[1] of May 15, 2006, claims 1-25 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,570,491 to Crovetto et al. ("Crovetto") in view of U.S. Patent No. 6,396,515 to Hetherington et al. ("Hetherington"). Applicants traverse the rejections of claims 1-25 for the reasons set forth below.

II.   Rejection of claims 1-25 under 35 U.S.C. § 103(a)

Applicants traverse the rejection of claims 1-25 under 35 U.S.C. § 103(a) because the Examiner has not established a *prima facie* case of obviousness. To establish *prima facie* obviousness under 35 U.S.C. § 103(a), three requirements must be met. First, the applied references, taken alone or in combination, must teach or suggest each and every element recited in the claims. *See* M.P.E.P. § 2143.03 (8th ed. 2001). Second, there must be some suggestion or motivation, either in the reference(s) or in the knowledge generally available to one of ordinary skill in the art, to combine or modify the reference(s) in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of these requirements must "be found in the prior art, and not be based on applicant's disclosure." M.P.E.P. § 2143 (8th ed. 2001).

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

In the Office Action, the Examiner admitted that *Crovetto* does not teach or suggest "generating a user interface layout corresponding to a locale" as recited in claim 1 (OA at 7). The Examiner then relied upon *Hetherington* to supply the missing teaching.

However, *Hetherington* fails to cure the deficiencies of *Crovetto*. That is, *Hetherington* also does not teach "generating a user interface layout corresponding to a locale" as recited in claim 1. Although the Examiner asserted that the "regional setting" in *Hetherington* (Col. 5, lines 1-12) constitutes "generating a user interface layout corresponding to a locale" (OA at 3), this is not correct.

The cited portion of *Hetherington* describes a process in FIG. 2A which reloads different language text drawn from a different user interface text storage object 208 when a language change request is received (Col. 3, lines 50-58). However, as shown in its FIGs. 2C and 2D, *Hetherington* combines texts from separate storage objects 208 (corresponding to different languages) with items from operational objects 212 to generate displays 210 in texts corresponding to different languages. FIG. 2C shows a menus in English with text in English, and FIG. 2D shows a menu with text in Japanese. However, as clearly shown in FIGs. 2C and 2D, although the two menus are shown in different languages, the layout of the menus is the same. As such, *Hetherington* does not teach or suggest "generating a user interface layout corresponding to a locale," as recited in claim 1.

The Examiner further asserted that the U.S. patent No. 6,339,755 entitled "Method, System, and Data Structure for Splitting Language and Locale Properties in a Data Processing System," which is incorporated by reference in *Hetherington*, "explicitly

illustrates locale interface layout determination." (OA at 7). This is not correct. Contrary to the Examiner's assertion, no portion of the '755 patent illustrates "a user interface layout corresponding to a locale." The Examiner appears to assert that the languages of the '755 patent constitute the claimed "locale" and the menus of the '755 patent constitute the claimed "user interface layout." However, FIGs. 2C and 2D of the '755 patent clearly show that although the layout of the two menus is the same, the languages (arguably constituting a "locale,") of the two menus are different. That is, the menu layouts do not correspond to the languages. As such, the '755 patent also does not teach or suggest "generating a user interface layout corresponding to a locale," as recited in claim 1.

As such, neither *Crovetto* nor *Hetherington* teaches "generating a user interface layout corresponding to a locale," as recited in claim 1. Therefore, the cited references cannot teach "outputting the data, the data including the user interface element, and the user interface element being present in the user interface layout," as recited in claim 1. Because the applied references, taken alone or in combination, do not teach or suggest each and every element recited in claim 1, the Examiner has not established a *prima facie* case of obviousness in regard to the claim. Accordingly, the rejection of this claim under 35 U.S.C. § 103(a) should be withdrawn and the claim allowed.

Independent claims 5, 9, 18 and 22, although of different scope, include recitations similar to those of claim 1. For at the least the same reasons presented above in connection with claim 1, the Examiner has not established a *prima facie* case of obviousness in regard to these claims. Accordingly, the rejection of these claims should be withdrawn and the claims allowed.

Claims 2-4 depend from claim 1, claims 6-8 depend from claim 5, claims 10-17 depend from claim 9, claims 19-21 depend from claim 18, and claims 23-25 depend from claim 22. For at least the reasons presented above in connection with independent claims 1, 5, 9, 18, and 22, the Examiner has not established a *prima facie* case of obviousness in regard to these claims. Accordingly, the rejection of these claims should be withdrawn and the claims allowed.

III.   Conclusion

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1-25 in condition for allowance. Applicants submit that the proposed amendments of claims 1-25 do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner. Furthermore, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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